

Sharqueva McCoy 1 Email:Quevabeliever@Icl oud.com 2 P.O. Box 104 Chattanooga Tn 37404 3 4 5 Sharqueva McCoy Plaintiff 6 VS. 7 Jeff Bezos CEO of Amazon.INC 8 410 Terry Ave, North Seattle, WA, 98109-Defendant Amazon CHA 1 10 Fullfillment center 7200 discovery dr. 11 Chattanooga, Tn 37416 12 13 14 15 1.6 17 18

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Circuit Court of Hamilton County

30C552

Complaint

Dated this 12^{th} day of May, 2020

Sharqueva McCoy Email:Quevabeliever@Icl oud.com P.O. box 104 Chattanooga,Tn 37401

The information contained in the following paragraphs are the allegations made against you and your company. These allegations concerns many civil cases that deals with the negligence and the continuous failure to uphold the federal guidelines and regulations that applies to and violates federal rights in the workplace. Your company has violated the Fair Labor Standard Act, the Affordable Care Act also violating the Equal Employment Opportunities Act of 1964.

In result of these violations the plaintiff Sharqueva McCoy has suffered from, Intentional Infliction of mental distress, Disparate Treatment Discrimination, and work related injuries that requires medical rehabilitation and workers compensation

Plaintiff Sharqueva McCoy brings forth the following causes of action and alleges the following:

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- 1. Plaintiff is a single mother of two and a former employee of Amazon CHA 1 facility that resides in Hamilton County.
- 2. Defendent is a cooperation and at the time of this complaint former employer of plaintiff, that in which CHA 1 resides in Hamilton County.
- 3. On September 17,2017 plaintiff began employment at the CHA 1 facility.
- 4. During PEAK season on January 2018 plaintiff experienced pain in the right wrist, in result plaintiff was sent on medical leave and approved for short-term disability. Upon returning back to work, plaintiff was moved to different department to work without accommodations for medical restrictions. Your company has failed to uphold the safety regulations of OSHA and in result the plaintiff have suffered from quotidian work related injuries.
- 5. May 26,2018 plaintiff received outstanding medical bill, Amazon payroll deducts biweekly insurance premiums, the insurance covered 0% of the medical bills. Leaving plaintiff with debt that later was sent to collections, this violates the Affordable Care Act and promotes hardship.
- 6. Plaintiff worked over 183 overtimes hours in the year of 2019 and was only paid \$179.33. Plaintiff have reported to CHAl facility of the missing wages, plaintiff still have not been paid for wages. In result of this action your company has violated the Fair Labor Standard Act.
- 7. In March of 2019 the right wrist of the plaintiff's injury began to reflare. The plaintiff began making visits to AM-CARE (Amazon on-site medical station)
- 8. Your company failed to accommodate the medical restrictions of the plaintiff right wrist and on April 5,2019 plaintiff was sent to multismalls station to pack heavy large bulk items that belongs on mutlilarge carts. Plaintiff continued to perform work satisfactorily, the company management then began to bring half empty carts. The plaintiff then began to double her speed and work in order to perform at the rate necessary to keep the job. Plaintiff continues to work through injuries with management ignoring plaintiff medical restrictions on file. She suffered from carpel tunnel syndrome of the right wrist. Your comapany has violated safety regulations of OSHA and has failed to provide the proper medical rehabilitation and workers compensation nescesssary to aid the injury of the employee, therefore violating the Affordable Care Act.
- 9.On May 21, 2019 plaintiff was sent to worker's comp doctor, she denied workers compensation but rendered medical restrictions and ordered certain accommodations, When plaintiff returned back to work, she was fired, but given a different reason. Plaintiff feels she was wrongfully terminated and that she has suffered Disparate Treatment Discrimination during the entire course of her employment.
- 10. Your company has failed to provide safe and healthy working conditions in which is a violation of OSHA guidelines and regulations.

The plaintiff was a hardworking former employee of Amazon who has suffered from intentional infliction of distress, due to the discrimination because of her, injury, race, and sexuality. Plaintiff brings forth the previous counts and allegations therefore seeking the amount 4 million all together with court cost and attorney fees.

1. My 5/4/2020